

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-88-E**

IN RE:)
)
Dominion Energy South Carolina, Inc.'s)
2021 Avoided Cost Proceeding Pursuant to)
S.C. Code Ann. Section 58-41-20(A))
_____)

**CAROLINAS CLEAN ENERGY
BUSINESS ASSOCIATION'S
SUPPLEMENTAL
INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO
DOMINION ENERGY SOUTH
CAROLINA, INC.**

Pursuant to S.C. Code Ann. Regs. 103-833 and by Order of the Chairman issued on August 23, 2021, the Carolinas Clean Energy Business Association ("CCEBA"), by and through its undersigned counsel, hereby submits this Supplemental Set of Interrogatories and Requests for Production to Dominion Energy South Carolina, Inc. ("DESC" or "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e) and Commission regulations, each request is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available.

INSTRUCTIONS

1. Responses to these requests should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.

4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.

5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.

6. Each request should be reproduced at the beginning of the response thereto.

7. If the response to any Request for Production of Documents is that the information requested is not currently available, please state when the information requested will become available.

8. This request shall be deemed continuing so as to require DESC to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

9. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

10. If a refusal to respond to a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each request on the basis of the entire knowledge of DESC, including information in the possession of DESC or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

12. If any request cannot be answered in full, respond to the extent possible and specify the reasons for DESC's inability to respond.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth

below:

1. "You," "your," and "Company" mean DESC or any of its affiliates, officers, directors, employees, attorneys, or agents.

2. "Application" is defined as the application filed by Dominion Energy South Carolina, Inc. on April 22, 2021 or as otherwise revised.

3. "Company" and "DESC" are defined as Dominion Energy South Carolina, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.

4. "Fairfield" refers to the Fairfield Pumped Storage hydroelectric facility in Jenkinsville, SC.

5. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information

generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audiotapes, and videotapes. The terms include drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

6. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

7. When used in referenced to a document, "identify," "identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no longer is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

INTERROGATORIES

In responding to each of the below Interrogatories, please refer to Mr. David's corrected Rebuttal testimony on Pages 9-10,¹ which now states:

However, as Mr. Burgess has seen in the "~~Guidehouse VIC 21 Calculation Workbook~~" Excel files for each solar tranche that were provided in response to ~~ORS request for records 1-4~~ Excel workbook files provided in response to CCEBA request for records 2-14, his statement flagrantly misrepresents how Guidehouse modeled the Company's system. As shown in these workpapers, Guidehouse's analysis shows DESC carrying available operating reserves in significant excess of the baseline 250 MW requirement in most hours; the cost to integrate solar capacity for each tranche is driven by the need to increase available operating reserves in the relatively small number of hours in which the Company does not carry an excess in the Baseline scenario and the ways in which overall system dispatch must change in other hours in order to accommodate those changes.

- 3-1 Please explain whether and how the "Baseline scenario" referred to on line 6 of page 10 refers to each scenario analyzed by Guidehouse that did not include any incremental operating reserve requirements.

RESPONSE:

- 3-2 Please explain whether and how the Excel files provided in CCEBA Request for Records 2-14, (specifically the file labeled "CCEBA Discovery Request 2-14 973 noInc Reserves") shows Guidehouse's analysis of a "Baseline scenario" without incremental operating reserves for Tranche 1.

RESPONSE:

¹ <https://dms.psc.sc.gov/Attachments/Matter/feec4547-8703-4b30-a50b-0820194ce311>

- 3-3 Please explain whether and how Guidehouse's analysis in the Excel file referenced above ("CCEBA Discovery Request 2-14 973 noInc Reserves") shows a "relatively small number of hours in which the Company does not carry an excess" of operating reserves, consistent with Mr. David's testimony.

RESPONSE:

- 3-4 Please explain whether and how "the cost to integrate solar capacity for each tranche is driven by the need to increase available operating reserves" to accommodate the hours in which the Company does not carry an excess of operating reserves (i.e., a reserve shortfall is projected).

RESPONSE:

- 3-5 Please explain whether and how the Excel files provided in response to CCEBA 2-14 were used to support the section of the Guidehouse VIC Study titled "Demonstrating the Need for Additional Reserves" including Table 13 and Figure 13.

RESPONSE:

- 3-6 In the Excel file referenced above ("CCEBA Discovery Request 2-14 973 noInc Reserves"), please explain whether there are a total of 156 hours projected to have a reserve shortfall between years 2022 and 2028. Please also explain whether the highest level of reserve shortfall among these 156 hours is 151 MW, occurring on 10/9/2027.

RESPONSE:

- 3-7 In the Excel file referenced above (“CCEBA Discovery Request 2-14 973 noInc Reserves”), please explain whether and how the projected shortfalls in 2029-2031 are erroneous due to the formula error Mr. David acknowledged on page 22 of his corrected Rebuttal testimony.

RESPONSE:

- 3-8 In the Excel file referenced above (“CCEBA Discovery Request 2-14 973 noInc Reserves”), for the hours projected to have a reserve shortfall, please identify the number of hours in which the Fairfield facility was providing operating reserves. For the hours in which Fairfield was not providing operating reserves, please explain why not.

RESPONSE:

- 3-9 In the Excel file referenced above (“CCEBA Discovery Request 2-14 973 noInc Reserves”), please identify each hour in which PROMOD did not allow Fairfield to contribute to operating reserves. In each instance, please provide the reason why not.

RESPONSE:

- 3-10 In the Excel file referenced above (“CCEBA Discovery Request 2-14 973 noInc Reserves”), please provide both the pumping load and generation contribution for each hour from the Fairfield facility. Please also provide the forecasted reservoir levels during each hour, if available.

RESPONSE:

- 3-11 In the Excel file referenced above (“CCEBA Discovery Request 2-14 973 noInc Reserves”), please explain whether that Guidehouse calculated the Risk of Solar Shortfall to be 60% of hourly solar production, rather than 40% which is DESC’s current practice.

RESPONSE:

- 3-12 For the Baseline scenario analyzed in the Excel file referenced above (“CCEBA Discovery Request 2-14 973 noInc Reserves”), please identify the number of shortfall hours that would occur in the 2022-2028 timeframe if a 40% Risk of Solar Shortfall were used instead of 60%. Please note that this can be calculated in a matter of minutes by simply replacing the 0.6 multiplier in the formula in column G with a 0.4 multiplier. Please explain whether the number of reserve shortfall hours in this case would be zero.

RESPONSE:

- 3-13 In the Excel file referenced above (“CCEBA Discovery Request 2-14 973 noInc Reserves”), the formula in column G (“Risk of Solar Shortfall”) appears to reflect the possibility that a drop in solar production would be perfectly correlated (i.e., simultaneous) across all solar generators on DESC’s system. Please explain how this formula captures the uncorrelated nature of potential drops in solar production (i.e., geographic diversity).

RESPONSE:

- 3-14 In the Excel file referenced above (“CCEBA Discovery Request 2-14 973 noInc Reserves”), please explain why 250 was subtracted from the formula in column H for MW of Reserve Shortage. Please explain whether and how this is consistent with DESC’s current practice,

and whether or not reserves can simultaneously be held for both traditional generation contingencies as well as for solar shortfalls.

RESPONSE:

REQUESTS FOR PRODUCTION

3-1 Please provide all workpapers used or generated in responding to the above Interrogatories.

RESPONSE:

3-2 Please provide all documents referred to or relied upon in your responses to the above Interrogatories.

RESPONSE:

[Signature Page Follows]

Respectfully Submitted,

/s/Richard L. Whitt

Whitt Law Firm, LLC,
401 Western Ln., Suite E,
Irmo, South Carolina 29063,
(803) 995-7719.

/s/John D. Burns

Carolinas Clean Energy Business Association,
General Counsel,
919-306-6906,
Admitted Pro Hac Vice.

*Both as Counsel for Intervenor, Carolinas Clean
Energy Business Association.*

September 3, 2021